Remarks

Applicant respectfully requests reconsideration of the present application in view of the foregoing amendments and in view of the reasons that follow.

Applicant has enclosed with this amendment a Petition for Extension of Time under 37 CFR 1.136(a) to make this response timely.

Claims 1-14 remain pending. Numerous changes to the specification and claims have been made, most per the Examiner's recommendations, to more particularly point out and distinctly claim the subject matter of Applicant's invention. Applicant respectfully submits that no new matter has been added by this amendment.

In Paragraph 2 of the Office Action, the Examiner reminded Applicant to update the status of the Cross-Reference section of the application. This status update was made above by amending Paragraph 0001 of the specification.

In Paragraph 3, the Examiner recommended that the "Figure" labels appearing in the drawing sheets be the same as those shown in the specification. Applicant notes, however, that the specification, as filed, differs in this regard from the application as published, such that no further changes need to be made from the electronic version published as United States Patent Application Publication No. US 2005/0256964 A1. Nevertheless, for purposes of making this change of record in this Amendment, Applicant has enumerated the eleven instances above where the word "Figure" has been (or should be) changed to "FIG." throughout the specification.

In Paragraph 4 of the Office Action, the hyperlinks on pages 2 and 5 of the specification were objected to, since they cannot be incorporated by reference. These incorporation by reference statements have been deleted by amendments to the specification above.

In Paragraph 5 of the Office Action, the Examiner objected to the following antecedent basis problems: (i) claims 2 and 9 for "the MODBUS/TCP protocol"; (ii) claims 3 and 10 for "the serial MODBUS protocol"; and (iii) claim 8 for "said Web browser".

Applicant respectfully submits that the phrase "the MODBUS /TCP protocol" and the phrase "the serial MODBUS protocol" do not need an antecedent basis and are not indefinite since they are specific types of MODBUS protocols described in the specification and known in the art. Both are specific types of MODBUS protocols: the MODBUS/TCP protocol is described in regard to FIG. 3 of the specification; the serial MODBUS protocol is described in regard to FIG. 4 of the specification. Applicant submits that it would not make sense to amend these claims to become more indefinite and possibly confusing to those skilled in the art, e.g., to read "wherein the MODBUS type protocol is <u>a</u> MODBUS /TCP protocol", since there is only one protocol known as the MODBUS/TCP protocol per its specification.

Applicant has amended independent claim 8, since the phrase "said web browser" does not have a proper antecedent basis in the claim. Applicant intended this phrase to refer to "a personal computer", as can be seen from the preamble and from the last clause of the claim. This amendment is clearly supported in the specification as originally filed, particularly in the Summary of the Invention section at paragraph 0015.

In Paragraph 6, the Examiner objected the "whereby" clauses in dependent claims 2-7. Applicant has changed the word "whereby" to "wherein" per the Examiner's recommendation.

In Paragraph 7, the Examiner has stated that Claims 1-14 would be allowable if rewritten or amended to overcome the objections set forth in this Office Action. Applicant thanks the Examiner for his consideration.

Paragraphs 8 and 9 of the Office Action set forth the Examiner's statement of reasons for allowance. In order to avoid any misunderstandings regarding the interpretation and scope of Applicant's invention, Applicant makes the following clarifying comments:

(1) Regarding the Examiner's statement:

> "The feature of encapsulating a browser's HTTP message in a MODBUS type of protocol implies that the automation device must understand the HTTP message (via, e.g., an embedded web server)."

This feature of Applicant's invention, that the I/O module 203 is able to understand the message that arrives, is also stated in Paragraph 0029 of Applicant's specification. However, the I/O module does not need to include a full commercial web server: "In another simpler implementation, the web server could be coded to inspect the arriving message for a specific URL, and then respond to that message with a fixed response that is previously stored in memory. ... " Hence, Applicant notes that the feature of encapsulating a browser's HTTP message in a MODBUS type of protocol does not imply that the automation device must include an embedded web server.

(2) Regarding the Examiner's statement:

> "On the other hand, the requirement of "reformatting" (by the process) a reply message sent from the automation device implies that the reply message is formed differently."

Applicant's claimed invention only requires that the reply message using the MODBUS type protocol is sent from the automation device and is reformatted, not that the reply message is reformatted by the automation device. In other words, a simple I/O device could respond to the

request message with a reply message that only includes I/O data using the MODBUS type protocol, transmit this reply message data to the Proxy process 213, which then, in turn, would reformat this reply message for sending to the Web browser.

(3) Regarding the Examiner's statement:

> "That is, instead of using the encapsulation and decapsulation procedures for processing the inbound and outbound messages, the process handles an outbound message (sending from the automation device to the browser) by reformatting the message."

Applicant is not clear which encapsulation and decapsulation procedures and inbound and outbound messages are being referred to in this statement with respect to which devices. Nevertheless, as Applicant understands it, the Examiner is correct in stating that the Proxy process 213 handles a message sent from the I/O module 203 to the browser by reformatting the message.

In light of the foregoing Amendments and Remarks, Applicant respectfully submits that all claims are now in condition for allowance. Favorable consideration of the application as amended is respectfully requested.

The Examiner is invited to contact the undersigned by telephone if it is felt that a telephone interview would advance the prosecution of the present application.

Respectfully submitted,

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